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January 22, 2016

VIA ECF

Hon. Edgardo Ramos
U.S. District Judge
U.S. District Court
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: Lisa Gruber v. United Airlines, Inc.
Case No. 15 CV 03855-ER
C&F Ref: 35130

Dear Judge Ramos:

We are attorneys for defendant United Airlines, Inc. and, together with counsel for plaintiff Lisa Gruber, respectfully submit a joint request for amendment of the Civil Case Discovery Plan and Scheduling Order dated July 30, 2015 [DE 17]. Although the parties have been working diligently to conclude fact discovery by December 31, 2015 in accordance with the Order, some fact discovery remains outstanding, such as depositions of United's corporate representative and non-party witnesses. The parties do not anticipate needing an extension of the overall discovery cutoff of April 15, 2016 but respectfully request that the Order be amended to permit further fact discovery through April 15, 2016.

In the meantime, the parties are of the opinion that mediation may be fruitful at this time and respectfully request that the case be referred to a Magistrate Judge for a settlement conference.

Respectfully submitted,

CONDON & FORSYTH LLP

By Bartholomew J. Banino
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cc: Steven Falkoff, Esq. (via ECF)
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